

DECLARATION OF RYAN DOHMEN

1. I am a member of Charter Air Solutions, LLC. I am a citizen of Montana.
2. The only other member of Charter Air Solutions is Global Crossing Airlines, Inc., a Delaware corporation with its principal place of business in Miami, Florida.
3. Global became a member in Charter Air Solutions, LLC after this litigation was initiated.
4. Via Charter, I am seeking to compete for several million dollars' worth of business in the college athletics charter industry. Short's has already accused me of causing it more than \$1 million worth of damages.
5. I currently am not pursuing certain clients that I would like to pursue because of uncertainty regarding my legal rights and obligations.
6. These clients alone conservatively represent between \$100,000 and \$200,000 in additional annual income that I could earn personally.
7. I maintain that my competition is fair and lawful competition, whereas Short's maintains that I am competing through use of stolen trade secrets and in violation of my post-employment obligations.
8. In addition to alleging that I have stolen its trade secrets, Short's has also told third parties in the industry that I improperly transferred \$10 million of company money to Elite Airways without authorization and that my job performance cost it approximately \$1.5 million in losses in 2022. I maintain that these allegations are entirely false and inherently damaging to my business reputation.
9. I am seeking a declaratory judgment in addition to damages for actual losses, presumed damages, and punitive damages. I am seeking damages in excess of \$75,000 and in an amount to be determined by a jury.

I declare under the penalty of perjury under the laws of Florida and the United States of America that the foregoing is true and correct.

DocuSigned by: 12/22/2023
Ryan Dokmen Ryan Dokmen Date